

Exhibit D

November 22, 2023 Email

Schy, Levi R.

From: Hamill, Patricia <phamill@ClarkHill.com>
Sent: Wednesday, November 22, 2023 11:57 AM
To: Schy, Levi R.
Cc: Cohen, Jonathan Z.; McCool, Joseph P.; Kevin Siegel; Richards, Joshua W. B.
Subject: Re: Doe v. Haverford College 2:23-00299-GAM, Notice of Intent to Serve Subpoenas
Attachments: image001.png; image002.png; image003.png; image004.png; 51382801-v1-2023.11.22 - Haverford_Doe - Notice and Subpoena of Robert Doe ([REDACTED]).pdf; 51382800-v1-2023.11.22 - Haverford_Doe - Notice and Subpoena of Jane Doe ([REDACTED]).pdf

Dear Levi, we will accept service for both.

Thank you.

Patricia

Patricia M. Hamill

Member

Clark Hill

Two Commerce Square, 2001 Market Street, Suite 2620, Philadelphia, PA 19103

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phamill@clarkhill.com | www.clarkhill.com

Visit our Title IX and Campus Disciplinary website

On Nov 22, 2023, at 11:46 AM, Schy, Levi R. <levi.schy@saul.com> wrote:

[External Message]

Counsel,

Please see the attached Notices of Intent to Serve Subpoenas on [REDACTED] (Jane Doe) and [REDACTED] (Robert Doe). The attached subpoenas will be personally served on their respective recipients.

Thanks very much,

Levi R. Schy

Associate

SAUL EWING LLP | Philadelphia

Office: (215) 972-7803

From: Cohen, Jonathan Z. <jcohen@ClarkHill.com>
Sent: Monday, November 20, 2023 1:37 PM
To: Schy, Levi R. <levi.schy@saul.com>; Hamill, Patricia <phamill@ClarkHill.com>
Cc: McCool, Joseph P. <JMcCool@mmwr.com>; Kevin Siegel <kevin@KMSLawGroup.com>; Richards, Joshua W. B. <Joshua.Richards@saul.com>

Subject: RE: Doe v. Haverford College 2:23-00299-GAM, Discovery Service and Proposed Confidentiality Agreement and Protective Order

****EXTERNAL EMAIL** - This message originates from outside our Firm. Please consider carefully before responding or clicking links/attachments.**

Hi Levi,

Patricia will not be available until tomorrow. We will get back to you tomorrow with an answer regarding the subpoenas.

Thank you,
Jonathan

Jonathan Z. Cohen

Senior Attorney

Clark Hill

Two Commerce Square, 2001 Market Street, Suite 2620, Philadelphia, PA 19103
+1 215.422.4426 (office) | +1 215.901.7521 (cell) | +1 215.640.8501 (fax)
jcohen@clarkhill.com | www.clarkhill.com

From: Schy, Levi R. <levi.schy@saul.com>

Sent: Monday, November 20, 2023 1:19 PM

To: Hamill, Patricia <phamill@ClarkHill.com>; Cohen, Jonathan Z. <jcohen@ClarkHill.com>

Cc: McCool, Joseph P. <JMcCool@mmwr.com>; Kevin Siegel <kevin@KMSLawGroup.com>; Richards, Joshua W. B. <Joshua.Richards@saul.com>

Subject: RE: Doe v. Haverford College 2:23-00299-GAM, Discovery Service and Proposed Confidentiality Agreement and Protective Order

[External Message]

Jonathan, we received an out-of-office reply from Patricia. Kindly advise whether you and/or Patricia agree to accept service of subpoenas on behalf of [REDACTED] and [REDACTED], or whether we should have them personally served?

Levi R. Schy

Associate

SAUL EWING LLP | Philadelphia

Office: (215) 972-7803

From: Schy, Levi R.

Sent: Monday, November 20, 2023 12:52 PM

To: Hamill, Patricia <phamill@ClarkHill.com>; Cohen, Jonathan Z. <jcohen@ClarkHill.com>

Cc: McCool, Joseph P. <JMcCool@mmwr.com>; Kevin Siegel <kevin@KMSLawGroup.com>; Richards, Joshua W. B. <joshua.richards@saul.com>

Subject: Doe v. Haverford College 2:23-00299-GAM, Discovery Service and Proposed Confidentiality Agreement and Protective Order

Counsel,

Please find attached a draft confidentiality agreement and protective order for your review and comment. Also attached is the Haverford Defendants' First Set of Requests for Production of Documents Directed to Plaintiff.

@Hamill, Patricia, we intend to serve subpoenas for production of documents on Plaintiff's parents, [REDACTED] and [REDACTED]. Can you please advise whether you agree to accept service of subpoenas on behalf of [REDACTED] and [REDACTED] or whether we should have them personally served?

Thanks very much,

Levi R. Schy
Associate

(215) 972-7803

levi.schy@saul.com

[Read my bio >>](#)

Centre Square West
1500 Market Street, 38th Floor
Philadelphia, PA 19102-2186

"Saul Ewing LLP (saul.com)" has made the following annotations:

+~~~~~+

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